

LBB-1

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct. Executed on _____, 2002.

Larry B. Brotherson

QUALIFICATIONS OF LARRY B. BROTHERRSON

Larry B. Brotherson holds a Bachelor of Arts and a Juris Doctorate degree from Creighton University. Mr. Brotherson joined Northwestern Bell Telephone Company in 1979. He has held several assignments within Northwestern Bell, and later within Qwest, primarily within the Law Department. Over the past 20 years, he has been a state regulatory attorney in Iowa, a general litigation attorney, and a commercial attorney supporting several organizations within Qwest. His responsibilities have included evaluating and advising the company on legal issues, drafting contracts, and addressing legal issues that arise in connection with specific products. With the passage of the Telecommunications Act of 1996 ("the Act"), he was assigned to be the attorney in support of the Interconnection Group. In that role, he was directly involved in working with competitive local exchange carriers ("CLECs") negotiating contract language implementing various sections of the Act, including the Act's reciprocal compensation provisions. In 1999, Mr. Brotherson assumed his current duties as director of wholesale advocacy.

Mr. Brotherson's current responsibilities include coordinating the witnesses for all interconnection arbitrations and for hearings related to disputes over interconnection issues. Additionally, he works with various groups within the Wholesale Markets organization of Qwest in connection with regulatory proceedings associated with interconnection services.

LBB-2

R. Steven Davis
Sr. Vice President
Policy and Law

1801 California Street, Suite 4750
Denver, CO 80202
Phone 303 896-4200
Facsimile 303 298-8763



May 28, 2002

Raymond L. Gifford, Chairman
Public Utilities Commission
State of Colorado
1580 Logan Street, Office Level 2
Denver, CO 80203

Polly Page, Commissioner
Public Utilities Commission
State of Colorado
1580 Logan Street, Office Level 2
Denver, CO 80203

Jim Dyer, Commissioner
Public Utilities Commission
State of Colorado
1580 Logan Street, Office Level 2
Denver, CO 80203

Dear Commissioners:

There has been a lot of publicity over the past few weeks related to certain agreements that Qwest has entered into with competitive local exchange carriers. I am writing to advise you of new policies that Qwest is implementing in this area.

As you may know, ILECs routinely enter into agreements of many kinds with CLECs. Some of them may take effect immediately as in the normal business world. Others must be filed with and approved by state commissions before becoming effective. Qwest has filed over 3,200 agreements with CLECs since the passage of the Telecommunications Act, including both initial agreements and amendments. This large number reflects our efforts to work with individual CLECs to meet their specific business needs. However, questions have been raised regarding certain of Qwest's arrangements with CLECs. Some parties allege that under Section 252(a) of the Telecommunications Act such agreements should also have been filed and approved by state commissions.

Qwest disputes these allegations and is defending the legal line it drew between those agreements that did, and those that did not, need to be filed. Qwest also has filed a petition with the FCC asking for guidance on where the filing line is drawn.

Meanwhile, Qwest is implementing two new policies that will eliminate debate regarding whether Qwest is complying fully with applicable law. First, Qwest will provide all contracts, agreements or letters of understanding between Qwest and CLECs that create obligations to meet the requirements of Section 251(b) or (c) on a going forward basis. We believe this commitment goes well beyond the intended purpose of the 90-day approval process and the requirements of Section 252(a), the language of which suggests that agreements that must be filed "shall include a detailed schedule of itemized charges for interconnection and each service or network element included in the agreement." For any agreement for which there is some ambiguity, we will provide those agreements to you to get some guidance whether they should be filed under 252(a) or not. We will follow this policy until we receive a decision from the FCC on the appropriate line drawing in this area. Unless requested by the Commission, Qwest does not intend to file routine day-to-day paperwork, orders for specific services, or settlements of past disputes that do not otherwise meet the above definition.

Second, Qwest has reviewed and is enlarging its internal procedures for evaluating contractual arrangements with CLECs and associated filing requirements. Qwest is forming a committee of senior managers from the corporate organizations involved in wholesale agreements: wholesale business development, wholesale service delivery, network, legal affairs attorneys, and policy and law. This committee will review agreements involving in-region wholesale activities to ensure that the standard described above is applied prior to the issuance of an FCC ruling, and that any later FCC decision also is implemented fully and completely.

Qwest is implementing these policies to eliminate any question about Qwest's compliance with the requirements of Section 252(a) in this state while Qwest's petition to the FCC is pending. We hope to continue to work with CLECs to meet their individual needs, as we have in the past. This is a practice that we are proud of, and we do not want to see it obscured by controversy over the meaning of Section 252(a), or decisions on line drawing in a small number of situations.

To the extent there are questions or concerns associated with the procedure outlined in this letter, please contact me.

Sincerely,



R. Steven Davis

cc: Bruce N. Smith, Director
Geri Santos-Rach, Chief of Fixed Utilities

R. Steven Davis
Sr. Vice President
Policy and Law

LBB-2

1801 California Street, Suite 4750
Denver, CO 80202
Phone 303 896-4200
Facsimile 303 286-6763

May 9, 2002

Paul Kjellander, President
Commissioner Dennis Hansen
Commissioner Marsha Smith
Idaho Public Utilities Commission
472 W Washington
PO Box 83720
Boise, ID 83720-0074

Dear Commissioners:

There has been a lot of publicity over the past few weeks related to certain agreements that Qwest has entered into with competitive local exchange carriers. I am writing to advise you of new policies that Qwest is implementing in this area.

As you may know, ILECs routinely enter into agreements of many kinds with CLECs. Some of them may take effect immediately as in the normal business world. Others must be filed with and pre-approved by state commissions. Qwest itself has filed over 3,200 agreements with CLECs since the passage of the Telecommunications Act, including both initial agreements and amendments. This large number reflects our efforts to work with individual CLECs to meet their specific business needs. However, questions have been raised regarding a relative handful of our arrangements with CLECs. Some parties allege that under Section 252(a) of the Telecommunications Act such agreements also should have first been filed and approved.

Qwest disputes these allegations and is defending the legal line it drew between those agreements that did, and did not, need to be filed. Qwest also has filed a petition with the FCC asking for guidance on where the filing line is drawn.

Meanwhile, however, Qwest is implementing two new policies that will eliminate debate regarding whether Qwest is complying fully with applicable law. First, Qwest will file all contracts, agreements or letters of understanding between Qwest Corporation and CLECs that create obligations to meet the requirements of Section 251(b) or (c) on a going forward basis. We believe that commitment goes well beyond the requirements of Section 252(a). However, we will follow it until we receive a decision from the FCC on the appropriate line drawing in this area. Unless requested by the Commission, Qwest does not intend to file routine day-to-day paperwork, orders for specific services, or settlements of past disputes that do not otherwise meet the above definition.

Second, Qwest has reviewed and is enlarging its internal procedures for evaluating contractual arrangements with CLECs and making all necessary filings. Qwest is forming a committee of senior managers from the corporate organizations involved in wholesale agreements: wholesale business development, wholesale service delivery, network, legal affairs

attorneys, policy and law attorneys, and public policy. This committee will review agreements involving in-region wholesale activities to ensure that the standard described above is applied prior to the issuance of an FCC ruling, and that any later FCC decision also is implemented fully and completely.

Qwest is implementing these policies to eliminate any question about Qwest's compliance with the requirements of Section 252(a) in this state while Qwest's petition to the FCC is pending. We hope to continue to work with CLECs to meet their individual needs, as we have in the past. This is a practice that we are proud of, and we do not want to see it obscured by controversy over the meaning of Section 252(a), or decisions on line drawing in a small number of situations.

To the extent there are questions or concerns associated with the procedure outlined in this letter, please contact me.

Sincerely,



R. Steven Davis

cc: Joe Cusick, Idaho Public Utilities Commission-Telecommunications Section Supv.

R. Steven Davis
Sr. Vice President
Policy and Law

1801 California Street, Suite 4750
Denver, CO 80202
Phone 303 896-4700
Facsimile 303 298-8763

May 10, 2002

Ms. Diane Munns, Chairman
Mr. Mark Lambert, Board Member
Mr. Elliott Smith, Board Member
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319-0069

Dear Chairman Munns and Board Members Lambert and Elliott:

There has been a lot of publicity over the past few weeks related to certain agreements that Qwest has entered into with competitive local exchange carriers. I am writing to advise you of new policies that Qwest is implementing in this area.

As you may know, ILECs routinely enter into agreements of many kinds with CLECs. Some of them may take effect immediately as in the normal business world. Others must be filed with and pre-approved by state commissions. Qwest itself has filed over 3,200 agreements with CLECs since the passage of the Telecommunications Act, including both initial agreements and amendments. This large number reflects our efforts to work with individual CLECs to meet their specific business needs. However, questions have been raised regarding a relative handful of our arrangements with CLECs. Some parties allege that under Section 252(a) of the Telecommunications Act such agreements also should have first been filed and approved.

Qwest disputes these allegations and is defending the legal line it drew between those agreements that did, and did not, need to be filed. Qwest also has filed a petition with the FCC asking for guidance on where the filing line is drawn.

Meanwhile, however, Qwest is implementing two new policies that will eliminate debate regarding whether Qwest is complying fully with applicable law. First, Qwest will file all contracts, agreements or letters of understanding between Qwest Corporation and CLECs that create obligations to meet the requirements of Section 251(b) or (c) on a going forward basis. We believe that commitment goes well beyond the requirements of Section 252(a). However, we will follow it until we receive a decision from the FCC on the appropriate line drawing in this area. Unless requested by the Iowa Utilities Board, Qwest does not intend to file routine day-to-day paperwork, orders for specific services, or settlements of past disputes that do not otherwise meet the above definition.

Second, Qwest has reviewed and is enlarging its internal procedures for evaluating contractual arrangements with CLECs and making all necessary filings. Qwest is forming a committee of senior managers from the corporate organizations involved in wholesale

agreements: wholesale business development, wholesale service delivery, network, legal affairs attorneys, policy and law attorneys, and public policy. This committee will review agreements involving in-region wholesale activities to ensure that the standard described above is applied prior to the issuance of an FCC ruling, and that any later FCC decision also is implemented fully and completely.

Qwest is implementing these policies to eliminate any question about Qwest's compliance with the requirements of Section 252(a) in this state while Qwest's petition to the FCC is pending. We hope to continue to work with CLECs to meet their individual needs, as we have in the past. This is a practice that we are proud of, and we do not want to see it obscured by controversy over the meaning of Section 252(a), or decisions on line drawing in a small number of situations.

To the extent there are questions or concerns associated with the procedure outlined in this letter, please contact me.

Sincerely,



R. Steven Davis

CC: John R. Perkins, Consumer Advocate
Gary B. Witt, AT&T Senior Attorney

R. Steven Davis
Qwest
Sr. Vice President
Policy and Law

1801 California Street, Suite 4750
Denver, CO 80202
Phone 303 898-4200
Facsimile 303 296-8763

May 9, 2002

Commission Chair Anne Boyle
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
P.O. Box 94927
Lincoln, NE 68509-4927

Dear Commissioner Boyle:

There has been a lot of publicity over the past few weeks related to certain agreements that Qwest has entered into with competitive local exchange carriers. I am writing to advise you of new policies that Qwest is implementing in this area.

As you may know, ILECs routinely enter into agreements of many kinds with CLECs. Some of them may take effect immediately as in the normal business world. Others must be filed with and pre-approved by state commissions. Qwest itself has filed over 3,200 agreements with CLECs since the passage of the Telecommunications Act, including both initial agreements and amendments. This large number reflects our efforts to work with individual CLECs to meet their specific business needs. However, questions have been raised regarding a relative handful of our arrangements with CLECs. Some parties allege that under Section 252(a) of the Telecommunications Act such agreements also should have first been filed and approved.

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Meanwhile, however, Qwest is implementing two new policies that will eliminate debate regarding whether Qwest is complying fully with applicable law. First, Qwest will file all contracts, agreements or letters of understanding between Qwest Corporation and CLECs that create obligations to meet the requirements of Section 251(b) or (c) on a going forward basis. We believe that commitment goes well beyond the requirements of Section 252(a). However, we will follow it until we receive a decision from the FCC on the appropriate line drawing in this area. Unless requested by the Commission, Qwest does not intend to file routine day-to-day paperwork, orders for specific services, or settlements of past disputes that do not otherwise meet the above definition.

Second, Qwest has reviewed and is enlarging its internal procedures for evaluating contractual arrangements with CLECs and making all necessary filings. Qwest is forming a committee of senior managers from the corporate organizations involved in wholesale agreements: wholesale business development, wholesale service delivery, network, legal affairs attorneys, policy and law attorneys, and public policy. This committee will review agreements involving in-region wholesale activities to ensure that the standard described above is applied

prior to the issuance of an FCC ruling, and that any later FCC decision also is implemented fully and completely.

Qwest is implementing these policies to eliminate any question about Qwest's compliance with the requirements of Section 252(a) in this state while Qwest's petition to the FCC is pending. We hope to continue to work with CLECs to meet their individual needs, as we have in the past. This is a practice that we are proud of, and we do not want to see it obscured by controversy over the meaning of Section 252(a), or decisions on line drawing in a small number of situations.

To the extent there are questions or concerns associated with the procedure outlined in this letter, please contact me.

Sincerely,



R. Steven Davis

cc: Gene Hand, Director of Communications

R. Steven Davis
Sr. Vice President
Policy and Law

1801 California Street, Suite 4750
Denver, CO 80202
Phone 303 886-4200
Facsimile 303 298-8763



May 9, 2002

Ms. Ilona Jeffcoat-Sacco
North Dakota Public Service Commission
600 E Boulevard Avenue
Bismarck, ND 58505

Dear Ms. Jeffcoat-Sacco:

There has been a lot of publicity over the past few weeks related to certain agreements that Qwest has entered into with competitive local exchange carriers. I am writing to advise you of new policies that Qwest is implementing in this area.

As you may know, ILECs routinely enter into agreements of many kinds with CLECs. Some of them may take effect immediately as in the normal business world. Others must be filed with and pre-approved by state commissions. Qwest itself has filed over 3,200 agreements with CLECs since the passage of the Telecommunications Act, including both initial agreements and amendments. This large number reflects our efforts to work with individual CLECs to meet their specific business needs. However, questions have been raised regarding a relative handful of our arrangements with CLECs. Some parties allege that under Section 252(a) of the Telecommunications Act such agreements also should have first been filed and approved.

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Second, Qwest has reviewed and is enlarging its internal procedures for evaluating contractual arrangements with CLECs and making all necessary filings. Qwest is forming a committee of senior managers from the corporate organizations involved in wholesale agreements: wholesale

Ms. Ilona Jeffcoat-Sacco

May 9, 2002

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business development, wholesale service delivery, network, legal affairs attorneys, policy and law attorneys, and public policy. This committee will review agreements involving in-region wholesale activities to ensure that the standard described above is applied prior to the issuance of an FCC ruling, and that any later FCC decision also is implemented fully and completely.

Qwest is implementing these policies to eliminate any question about Qwest's compliance with the requirements of Section 252(a) in North Dakota while Qwest's petition to the FCC is pending. We hope to continue to work with CLECs to meet their individual needs, as we have in the past. This is a practice that we are proud of, and we do not want to see it obscured by controversy over the meaning of Section 252(a), or decisions on line drawing in a small number of situations.

To the extent there are questions or concerns associated with the procedure outlined in this letter, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Steven Davis". The signature is stylized with a large, looped "R" and a long, horizontal stroke extending to the right.

R. Steven Davis